

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
CHICAGO DIVISION**

UNITED STATES OF AMERICA

vs.

Case No: 1:07-cv-6321

Judge Wayne R. Andersen

ANGEL FIGUEROA

**ANGEL FIGUEROA'S SECOND UNOPPOSED MOTION FOR
EXTENSION OF TIME TO FILE REPLY TO GOVERNMENT'S
RESPONSE TO MOTION FILED UNDER 28 U.S.C. § 2255**

COMES now, the Petitioner, ANGEL FIGUEROA, by and through his undersigned counsel, and moves this Honorable Court for a second unopposed extension of time of thirty (30) days to file his reply to the government's response to his motion filed under 28 U.S.C. § 2255 from the current due date of February 11, 2008. In support of said motion, petitioner states as follows:

Undersigned counsel had spoken with Assistant United States Attorney Renato Mariotti regarding our request for production of the "first" motion and order on speedy trial. AUSA Mariotti had indicated that he would be in trial through the 17th of January but would, once out of trial, review the file and determine if there is a "first" motion and "first" order, and if so, obtain authorization to release it to us.

As of this date, the government has been too busy produce the documents requested by undersigned counsel and counsel also needs additional time in order to

obtain affidavits in support of petitioner's motion filed under 28 U.S.C. § 2255.

Counsel is requesting thirty(30) additional days in order to give AUSA Renato Mariotti extra time to retrieve and review the criminal file in this matter in order to respond to our request for production of the "first" motion and order on speedy trial and for undersigned counsel to obtain affidavits in support of the motion filed under 28 U.S.C. § 2255.

WHEREFORE, the petitioner, ANGEL FIGUEROA, respectfully requests that this Honorable Court grant this second unopposed motion and extend the time for filing his reply to the government's response to his motion filed under 28 U.S.C. § 2255 for an additional thirty (30) days from the current due date of February 11, 2008.

Respectfully submitted,

THE LAW OFFICE OF
WILLIAM MALLORY KENT

s/William Mallory Kent
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ATTORNEY FOR FIGUEROA

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing notice was served on Renato Mariotti, Office of the United States Attorney, 219 South Dearborn Street, Suite 500, Chicago, Illinois, 60604 and Scott Frankel, 77 W. Washington Street, Suite 1720, Chicago, Illinois, 60602 this the 7th day of February 2008.

s/William Mallory Kent
William Mallory Kent